

MARK A. BECKMAN
MBECKMAN@GRSM.COM
DIRECT DIAL: (212) 453-0724

GORDON&REES
SCULLY MANSUKHANI
YOUR 50 STATE PARTNER™

ATTORNEYS AT LAW
1 BATTERY PARK PLAZA, 28TH FLOOR
NEW YORK, NY 10004
WWW.GRSM.COM

August 28, 2019

VIA ECF

The Honorable Allyne R. Ross, U.S.D.J.
United States District Court
Eastern District of New York
255 Cadman Plaza East
Brooklyn, New York 11201

Re: *Torres, et al. v. Planned Lifestyle Services, Inc.*
Case No.: 1:19-cv-00462

Dear Judge Ross:

We represent defendant Planned Lifestyle Services, Inc. (“Defendant”) in the above-referenced case. We have conferred with plaintiffs’ counsel, and with their consent, we respectfully request, pursuant to Section I.E. of the Court’s Individual Rules and Practices, an extension of time for Defendant to answer, move, or otherwise respond to the Second Amended Complaint, filed June 10, 2019. The specific reasons for this requested extension include allowing the parties to discuss possible early resolution as well as to obtain the necessary information for a response, should the matter not resolve.

Accordingly, Defendant respectfully requests the Court extend Defendant’s time to answer, move, or otherwise respond to the Second Amended Complaint through and including 30 days from the Court’s order granting the request. As noted above, plaintiffs consent to the request, and this represents Defendant’s third request to respond to the Second Amended Complaint. The Court has set an initial conference in this matter for September 11, 2019. Defendant requests a concomitant adjournment of the initial conference. There are no other deadlines impacted by this request.

We appreciate the Court’s attention to this matter.

Respectfully submitted,



Mark A. Beckman

cc: All Counsel of Record (*via ECF*)